

Andrew J. Waldera [ISB # 6608]
SAWTOOTH LAW OFFICES, PLLC
1101 W. River Street, Suite 110
P.O. Box 7985
Boise, Idaho 83707-7985
T (208) 629-7447
F (208) 629-7559
E andy@sawtoothlaw.com

Attorneys for Protestant Pioneer Irrigation District

W047533 ✓
6/24/19
KT

RECEIVED
JUN 24 2019
WATER RESOURCES
WESTERN REGION

**BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO**

IN THE MATTER OF APPLICATION FOR
PERMIT NO. 63-34652 IN THE NAME
OF CAT CREEK ENERGY, LLC

NOTICE OF PROTEST

COMES NOW, Pioneer Irrigation District ("Protestant"), by and through its attorney of record Andrew J. Waldera of Sawtooth Law Offices, PLLC, hereby files this Notice of Protest to Application for Permit No. 63-34652 ("Application"), filed in the name of Cat Creek Energy, LLC.

The bases for the Protest are:

1. The Application may cause injury to existing water rights, specifically those of the Protestant.
2. The Application is contrary to, or may conflict with Idaho Code Section 42-203A(5), subsections (a) through (f).
3. For such other and further reasons as may be set forth at the hearing on this matter.

RELIEF REQUESTED

The Protestant respectfully requests that for the above listed reasons, proposed Application for Permit No. 63-34652 be denied absent sufficient permit conditioning. Therefore,

the Protestant respectfully requests that any approval of Application for Permit No. 63-34652 be conditioned upon complete protection of the Protestant's existing water rights.

DATED this 24th day of June, 2019.

SAWTOOTH LAW OFFICES, PLLC

By 

Andrew J. Waldera

Attorneys for Protestant Pioneer Irrigation District

CERTIFICATE OF SERVICE


I HEREBY CERTIFY that on this 24th day of June, 2019, I caused a true and correct copy of the foregoing **NOTICE OF PROTEST** to be served by the method indicated below, and addressed to the following:

Cat Creek Energy, LLC
398 9th Street, Suite 240
Boise, ID 83702
T (406) 459-3013

(X) U.S. Mail, Postage Prepaid
() Hand Delivered
() Overnight Mail
() Facsimile
() Email

Idaho Water Engineering
Attn: David R. Tuthill Jr.
2918 N. El Rancho Place
Boise, ID 83704
T (208) 378-15130

(X) U.S. Mail, Postage Prepaid
() Hand Delivered
() Overnight Mail
() Facsimile
() Email


Andrew J. Waldera